

# **EXHIBIT 22**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al., )  
                                )  
                                )  
Plaintiffs,         ) Case No.  
                            )  
                            ) 4:20-cv-00957-SDJ  
vs.                     )  
                            )  
GOOGLE LLC,         )  
                            )  
Defendant.         )  
                            )

DEPOSITION OF JOHN OLSON,

30(b)(6) DESIGNEE FOR THE STATE OF IDAHO

May 3, 2024

Reported by:

Rebecca Martin, CSR #1108, RPR, CRR

Job No. CS6657429

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1 at in the preamble to Section 48-603 that requires  
2 that a person knows, or in the exercise of due care  
3 should know, do you agree with me that to establish  
4 that Google violated these four provisions of  
5 Section 48-603, Idaho has to show that Google knew  
6 or in the exercise of due care should have known it  
7 was violating these sections of the Consumer  
8 Protection Act?

9 MS. SCHULTZ: Object to form.

10 THE WITNESS: That appears to be what the  
11 statute requires.

12 Q. (BY MS. CURRAN) Okay. We can put that  
13 aside.

14 When did Idaho discover the harm that  
15 it's alleging in this case?

16 A. As part of the multistate investigation,  
17 during that process.

18 Q. And during that process, did Idaho  
19 uncover any Idaho-unique -- any harm that's unique  
20 to Idaho?

21 A. I'm going to answer that we did not  
22 discover any harm unique to Idaho that is different  
23 from that described in the Fourth Amended Complaint  
24 and in our responses to the interrogatories and as  
25 described by the Texas witness with respect to

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1 common facts and allegations.

2 Q. Do you know whether Idaho sent a  
3 document hold notice to the Consumer Protection  
4 Division?

5 A. At what point in time?

6 Q. Ever.

7 A. Yes.

8 Q. In connection with this lawsuit?

9 A. Yes.

10 Q. When did it send a document hold notice  
11 to the Consumer Protection Division in connection  
12 with this lawsuit?

13 A. I would not describe it necessarily as a  
14 formal letter document hold, but it was around the  
15 time of production of documents that the Idaho  
16 Attorney General's Office made in response to  
17 Google's request for production. That would have  
18 been in or around April or May of 2023.

19 Q. So the document hold was put in place in  
20 or around May -- April or May of 2023?

21 A. That is correct.

22 Q. Do you know why a document hold was not  
23 issued when the first complaint was filed?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: Yes. I'm trying to figure out

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1 how to answer that without getting into attorney's  
2 mental impressions.

3 You know, I'll answer it this way: When  
4 Google asked for consumer complaints, we decided  
5 that, well, if Google is going to ask for them, we  
6 oughta make sure that those are retained and not  
7 purged, per any scheduled retention policy.

8 Q. (BY MS. CURRAN) Is it fair to say that  
9 Idaho has produced all documents that provide the  
10 factual basis for or in any way support the  
11 allegations in this action?

12 A. Can you repeat that question, please?

13 Q. Is it fair to say that the State of  
14 Idaho has produced all documents that provide the  
15 factual basis for or in any way support the  
16 allegations in this action?

17 A. I need to qualify --

18 MS. SCHULTZ: Object to form.

19 THE WITNESS: -- a couple of things.

20 First of all, our production obligations  
21 and ability is limited to those documents for which  
22 we have possession, custody, or control, and our  
23 document -- our production obligations, it's in  
24 response to the document requests from Google.

25 With those, yes, we have produced the

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1 REPORTER'S CERTIFICATE  
2

3 STATE OF IDAHO )  
4 ) ss.  
5 COUNTY OF ADA )  
6

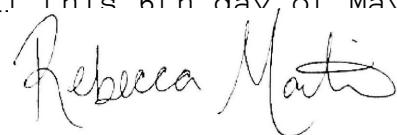
7 I, REBECCA MARTIN, Certified Shorthand Reporter and  
8 Notary Public in and for the State of Idaho, do hereby  
9 certify:  
10

11 That prior to being examined, the witness named in  
12 the foregoing deposition was duly sworn remotely by me to  
13 testify to the truth, the whole truth and nothing but  
14 the truth;

15 That said deposition was taken down by me in  
16 shorthand at the time and place therein named and  
17 thereafter reduced to typewriting under my direction,  
18 and that the foregoing transcript contains a full, true  
19 and verbatim record of said deposition.

20 I further certify that I have no interest in the  
21 event of the action.

22 WITNESS my hand and seal this 6th day of May 2024



23 REBECCA MARTIN  
24 RPR and Notary  
25 Public in and for the  
State of Idaho

My Commission Expires: 08-27-2024